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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARY ANN SUSSEX, et al.,
Plaintiffs

CASE NO.: 2:08-cv-00773-MMD-PAL

vs.
TURNBERRY/MGM GRAND TOWERS,
LLC et al.,

Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS 8 AND 10-35
OF NORMAN BLUMENTHAL'S DECLARATION IN SUPPORT OF EX PARTE
APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND MOTION FOR
PRELIMINARY AND PERMANENT INJUNCTION ENJOINING DEFENDANTS
FROM SEEKING THE DISQUALIFICATION OF ARBITRATOR HARE IN NEVADA
STATE COURT**

1 Plaintiffs respectfully move this Court for the entry of an Order granting Plaintiffs the
2 right to file under seal Exhibits 8 and 10-35 of Norman Blumenthal's Declaration in Support of
3 *Ex Parte* Application for a Temporary Restraining Order and Motion for Preliminary and
4 Permanent Injunction Enjoining Defendants From Seeking the Disqualification of Arbitrator
5 Hare in Nevada State Court.

6 **Statement of Points and Authorities in Support of Plaintiff's Motion for Leave to File**
7 **Exhibits 8 and 10-35 of the Blumenthal Declaration Under Seal**

8 This Motion is made pursuant to Rule 7, Fed.R.Civ.P., as well as Rule 7-2(a) and Rule
9 10-5, L.Civ.R.

10 Section 24.10 of the Purchase and Sale Agreement, which forms the basis by which
11 Defendants compelled arbitration in this matter, requires that all proceedings remain
12 confidential. In accordance with Section 24.10, such confidential material as is included in the
13 Normal Blumenthal Declaration must be filed under seal.

14 Accordingly, Plaintiffs respectfully request that the Court enter an Order Granting
15 Plaintiffs the right to file under seal Exhibits 8 and 10-35 of Norman Blumenthal's Declaration
16 in Support of *Ex Parte* Application for a Temporary Restraining Order and Motion for
17 Preliminary and Permanent Injunction Enjoining Defendants From Seeking the Disqualification
18 of Arbitrator Hare in Nevada State Court.

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20 DATED this 26th day of April, 2013.

21 By: Ricardo Ehmann
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing
3 Procedures, I certify that I am an employee of GERARD & ASSOCIATES, and that the
4 following documents were served via electronic service: PLAINTIFF'S MOTION FOR
5 LEAVE TO FILE UNDER SEAL EXHIBITS 8 AND 10-35 OF NORMAN
6 BLUMENTHAL'S DECLARATION IN SUPPORT OF EX PARTE APPLICATION FOR
7 A TEMPORARY RESTRAINING ORDER AND MOTION FOR PRELIMINARY AND
8 PERMANENT INJUNCTION ENJOINING DEFENDANTS FROM SEEKING THE
9 DISQUALIFICATION OF ARBITRATOR HARE IN NEVADA STATE COURT.

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27 DATED this 26th day of April, 2013.

28 By: 